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Attorney for Defendant
ARMAND ION

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 8:22-cr-00145-1
Plaintiff,)
v.)
ARMAND ION,)
Defendant.)
DEFENDANT'S SENTENCE
POSITION WITH EXHIBITS

Defendant ARMAND ION, through counsel, hereby submits his Sentencing Position, with Exhibit.

Defendant reserves the opportunity to make additional comments at the sentencing hearing in this matter.

Date: June 10, 2024

Respectfully submitted:

LAW OFFICE OF
ANDREW M. STEIN

By /s/Andrew M. Stein
ANDREW M. STEIN
Attorney for Defendant
ARMAND JON

1 **I.**

2 **OVERVIEW AND RECOMMENDED SENTENCE**

3 On February 7, 2024, Defendant Armand Ion, age 43, pleaded guilty to Counts
4 2 and 4 of the indictment in violation of 18 U.S.C. § 1344(2) and 18 U.S.C.
5 §1028(A)(1).

6 The presentence report has done a thorough and precise job explaining the
7 defendant's background and characteristics.

8 The United States Probation Office (USPO) recommends a sentence of 51
9 months. While the Defendant, through counsel, believes that the USPO has done an
10 exceptional job of presenting the issues in this case, we would ask for a lesser prison
11 term.

12 **II.**

13 **ACCEPTANCE OF RESPONSIBILITY**

14 Mr. Ion's remorse statement for being involved in this criminal enterprise is
15 attached in a letter hereto as Exhibit "A".

16 **III.**

17 **OBJECTIONS TO PRESENTENCE REPORT**

18 The Defendant objects to paragraphs 67 through 72 of the Presentence Report,
19 in that he has no way to verify the statements in said paragraphs.

20 **IV.**

21 **CONCLUSION**

22 Based on the foregoing grounds, including the defendant's remorse and
23 personal self-rehabilitation, Defendant through counsel, respectfully requests that he
24 be sentenced to less than the 51 month term of imprisonment recommended by the
25

1 U.S. Probation Office, to be followed by 3 years and supervised release and a fine of
2 \$10,000.

3 It is submitted that sentenced along these lines would be “sufficient, but not
4 greater than necessary” to effectuate justice and to adequately address the sentencing
5 factors set forth at 18 U.S.C. § 3553(a).

6
7 Date: June 10, 2024

Respectfully submitted:

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LAW OFFICE OF
ANDREW M. STEIN

10 By /s/Andrew M. Stein _____
11 ANDREW M. STEIN
12 Attorney for Defendant
ARMAND ION

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